19th October 2025

Dear Danielle Cooper,

Planning Application no 2025/92440 (Lumb Lane former plant nursery): OBJECTION

My comments relate to the substituted scheme for 4no houses in the greenbelt, though all plans and supporting information have been reviewed. As you will be aware many of the latter are out of date and there is inconsistency between several documents and consultants' advice and resultant plans.

The proposals fail to recognize the distinctive and much valued characteristics of the area and the contribution the site makes, with or without the existing greenhouses, to preserving its special character. If implemented the scheme would:-

- harm the openness and permanence of the greenbelt;
- adversely affect the significance and settings of nearby heritage assets and those within the viewshed;
- damage the natural environment on and around the site

Harm to Greenbelt

The site is located well within the designated greenbelt. The area has a historic agrarian landscape which includes ancient woodland and a sparse and dispersed pattern of historic buildings. There are three working farms (Low Common, Fletcher House, Lumb Head) and several smallholdings looking after cattle, sheep, pigs, goats, hens and horses; and there is an abundance of wildlife. Lumb Lane provides the opportunity to be immersed in this rural historic environment, as it winds from Sharp Lane up towards the dramatic iron age hillfort of Castle Hill.

In consideration of planning applications, paragraph 153 of the National Planning Policy Framework (NPPF) requires local planning authorities to give substantial weight to any harm to the greenbelt, including harm to its openness. Proposals would remove the openness of the site - a key characteristic of the area which is of great amenity value allowing continuous connection with the rural environment along the length of Lumb Lane. The presence of the high stone walls of Yew Croft (opposite the site) gives added importance to retaining openness and views across the nursery site.

The application seeks to reclassify the site as 'grey belt'. Existing greenhouses and polytunnels are temporary in nature, low level and transparent. The small rest-room with open-sided store is similarly ad-hoc. The site has been in horticultural use (non-retail) for

about 50 years; and previously it was occupied by allotments. Paragraph 154 item (g) of the NPPF discounts temporary structures from classification as previously developed land and the proposed use of the site does not meet any of the exceptions tests set out.

Notwithstanding the above, the criteria set out at para 155 (a)(b)&(c) for 'grey belt' consideration cannot be met. They are to be taken as a whole:

- proposals would replace the open rural situation on site with a housing layout of suburban characteristics, with high fenced boundaries, detached garages, over-large areas of hard-standing (not all paths are shown), and a repositioned and splayed front boundary wall - resulting in curtailment of openness and views and loss of alignment of the historic pack-horse route
- 3no four-bed houses and 1no three bed house is not a significant contribution to unmet housing need. They are unlikely to be affordable. There are similar houses, for sale and/or empty, in Lumb Lane, Arkenley, Sharp Lane and St Helen's Gate
- the site is remote from public transport; and KC Highways plus Paragon consultants require a high number of vehicles to serve the four houses (13no including only one visitor space) generating a 9m wide two-way access onto the lane (twice as wide as the metalled road and not shown on plans)! The application falsely claims 10 vehicles were parked on site, whereas only the delivery van was parked overnight and one car - that of the owner – visited on most days.

The site fails to satisfy greybelt criteria and proposals would be harmful to the greenbelt, its openness and the special rural and historic landscape in this part of the Woodsome Valley.

Harm to Heritage Assets and their Settings

Previous uses of the site have complimented the rural, agricultural character of the area and its loose and scattered historic settlement pattern. Importantly the current openness of the site also allows nearby heritage assets, each of different character, to be appreciated within their own settings: - the stand-alone mansion and coach house (south of lane); the charming gabled cottage and associated outbuildings (west); the earlier row of weavers' cottages (east). Buildings at Clough Ings (west) were historically associated with dairy produce. The c200 years old weavers' cottages (40-50 LL) are illustrative of the pre-industrial economy of the area - Almondbury having been an important market centre for cloth. They are listed in the national context at grade 11. In accordance with Section 66(i) of the Planning (Listed Buildings and Conservation Areas) Act 1990 local authority decision makers are required to have special regard to preserving the settings of designated heritage assets. Whether listed or not, these heritage assets are an irreplaceable resource and their rural context is an important aspect of their significance.

Settings can be viewed from near or far; and there are many distant and public viewpoints where the current openness of the site contributes to the setting of heritage assets adjacent to the site or those dispersed within the valley. Dynamic viewpoints include prospects across fields from the lower stretch of Sharp Lane, views from Lumb Lane (descending from Fletcher House Farm entrance) where the site is seen in relation to Bottoms Farm longhouse

and also the distant mill, and in wider context views down from Clough Hall Lane and from public rights of way over Haigh Springs and those leading into Molly Carr Wood.

Along Lumb Lane, after the bungalows, most of the buildings are listed (16no) and set apart. There is only one new house, located at Lumb where it replaced an earlier dye house c1980s loosely copying its form and materials. A new development on the nursery site, built to modern highway regulations and other expectations, would be alien to the special historic character of the area. It would rob existing stand-alone assets of their own settings. The proposed larger house and annex closely associated with Clough Ings, and the three houses adjacent to the weavers' cottages, would each be a pale imitation of their authentic neighbour and, in spite of slight set-backs, they would be read in association with the originals, thereby undermining their special historic and architectural significance.

Harm to the Natural Environment

It has been noted that the baseline ecological survey submitted is out of date by over two years. Even comparing the existing situation with the development proposed, it is highly unlikely that obligations to achieve 10% Biodiversity Net Gain will be reached. The previous survey noted Noctule Bats (priority species) present. Bats regularly fly over adjacent gardens. This year Barn Owls have reared chicks in trees adjacent to Yew Croft. Swallows return here each year and are frequently seen on the telegraph wires over the site. Otters recorded at Clough Hall ponds are thought to have used the site's boundary watercourse to navigate from the valley bottom. Roe deer commonly run across the area.

Contrary to the reports, greenhouse bases have not sterilized the site and nature is visibly reclaiming it. The greenhouses appear to be drained naturally and have loose laid concrete slabs below the staging. The later polytunnels appear to have permeable gravel over soil. The only solid base is under, and slightly beyond, the storage building. By contrast proposed houses, annex and garages would seal the surface.

Proposals include a very large area of unspecified permeable hardstanding dedicated for vehicular use. Paths from side doors have not been accounted for in landscape proposals. Site sections across the site (front to back) have not been shown, nor any information about the detached garages. The latter would be quite close to trees in the NE corner (supporting bats). The relationship with adjacent sites is particularly concerning. The Street Scene drawing implies that buildings would follow the slope but be dug down into the site adjacent to the cottages. The latter would affect the front coal cellar and the natural boundary conditions (front and side) at my neighbour's house (no 50). If the proposed houses were raised they would over-dominate the cottages and compromise the privacy of the enclosed front garden of Yew Croft. The tall deep hedge at Clough Ings currently provides important cover for various species and this would be adversely affected by construction of new buildings so close to it.

The watercourse forming the rear boundary is currently open to the site but would be closed off by high solid timber fencing. Typical boundaries would retain openness to the watercourse, or be of natural scrub/hedging, or at least be low and highly permeable. It is

important to remove such barriers to water and foraging and to facilitate easy access to habitats. Within existing gardens mixed hedge boundaries or dry stone walling is 'the norm'.

Plans show soakaways to each house, but the geotechnical report says these are unlikely to be effective with underlying sandstone. Worryingly the Design and Access Statement specifies 'dusk to dawn' lighting in contradiction of KC's Ecology consultation. This would not only be harmful to the character of the site but also to the flourishing of the natural environment.

Paragraph 187 (NPPF) states that planning policies and decisions should contribute to and enhance natural and local environments by protecting and enhancing valued landscapes and sites of biodiversity. It goes on to say that they should recognize the intrinsic character and beauty of the countryside and the wider benefits from natural capital and ecosystems. The proposals in both principle and detail go against these imperatives. The White Rose Tree Planting project will shortly take place in the valley. Its role is to support nature recovery and combat climate change whilst reinforcing the area's natural beauty. A high value should be placed on maintaining these intrinsic qualities - qualities that can be easily lost through incremental changes over time.

Summary

Government policies promote access to the countryside for health and well-being, recreation, exercise and pure enjoyment. This valley, is a much used resource for people in the region– its walkers, runners, cyclists, horse-riders and picnickers. Lumb Lane is of high amenity value and relatively quiet and safe from high volumes of traffic (cattle are moved along it frequently from field to field, people push buggies). It also attracts people from the wider area due to the dominance and openness of the iron age hillfort (SAM) at its summit, and the spectacular views from many tracks, lanes and the hillfort itself.

Proposals go against statute and policy as they would:

- be harmful to the openness of the greenbelt
- be damaging to the historic character and tranquillity of the rural environment
- adversely affect the settings of heritage assets
- erode the natural connectedness and regenerative capacity of the site

The application contains unresolved, misleading and contradictory material. The 'untidiness' of the site is no argument for its development. We respectfully request that you recommend refusal of the application in the strongest terms.

Yours sincerely,